

**REMARKS**

By this amendment, claims 1 and 10 have been amended and claim 16 has been canceled. Accordingly, claims 1-15 and 17 are currently pending in the application.

In view of the above amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

**35 U.S.C. 112 CLAIM REJECTIONS**

In the Office Action, at page 2, numbered paragraphs 1 and 2, claim 10 is rejected because there is insufficient antecedent basis for the limitation “the photoelectron-motive force is formed by ...” Claim 10 is amended to depend from claim 9, which describes the limitation for the photoelectron-motive force. In view of the above, it is respectfully submitted that the rejection of claim 10 be withdrawn.

**REJECTIONS OF CLAIMS 1, 6-9, 13 AND 14 UNDER 35 U.S.C. 103(a)**

In the Office Action, at page 2, numbered paragraph 3, claims 1, 6-9, 13, and 14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant admitted prior art (AAPA) in view of Hiroki, U.S. 2002/0173060 (hereinafter, “Hiroki”). “To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.” In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Neither AAPA nor Hiroki, alone or in combination, teach or suggest all of the elements recited in claims 1, 6-9, 13, and 14 of the present application; therefore, Applicant respectfully traverses this rejection for at least the following reasons.

Independent claim 1 has been amended to include the features of allowable

dependent claim 16 as stated in the Office Action at page 9, numbered paragraph 8. In particular, claim 1 recites: "wherein the first and second mother substrates are erected to be disposed parallel to a gravitational force direction and transferred so as to manufacture the liquid crystal display device after the thin film transistor unit cells and the color filter unit cells are formed on the first and second mother substrates, respectively." Therefore, for at least the reason discussed above, independent claim 1 patentably distinguishes over the references relied upon by the Examiner. Accordingly, it is respectfully requested that the rejection of claim 1 be withdrawn.

Claims 6-9, 13, and 14 depend from independent claim 1, and are patentable for at least the reasons discussed above. Accordingly, it is respectfully requested that the rejections of claims 6-9, 13, and 14 be withdrawn.

**REJECTIONS OF CLAIMS 5 AND 15 UNDER 35 U.S.C. 103(a)**

In the Office Action, at page 7, numbered paragraph 5, claims 5 and 15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant admitted prior art (AAPA) in view of Oku, et al., U.S. 2002/0063836 (hereinafter, "Oku"). Applicant respectfully traverses this rejection because neither AAPA nor Oku, alone or in combination, teach or suggest all of the elements recited in claims 5 and 15 of the present application since claims 5 and 15 depend from independent claim 1. Therefore, claims 5 and 15 are patentable for at least the reasons discussed above. Accordingly, it is respectfully requested that the rejections of claims 5 and 15 be withdrawn.

**REJECTION OF CLAIM 17 UNDER 35 U.S.C. 103(a)**

In the Office Action, at page 8, numbered paragraph 6, claim 17 was rejected under 35 U.S.C. 103(a) as being unpatentable over AAPA and Hiroki as applied to claims 1, 6-9,

and 13-14 above, and further in view of Ge, U.S. 2002/0118321 (hereinafter, "Ge").

Applicant respectfully traverses this rejection because neither AAPA nor Hiroki nor Ge, alone or in combination, teach or suggest all of the elements recited in claim 17 of the present application since claim 17 depends from independent claim 1. Therefore, claim 17 is patentable for at least the reasons discussed above. Accordingly, it is respectfully requested that the rejection of claim 17 be withdrawn.

#### **ALLOWABLE SUBJECT MATTER**

In the Office Action, at page 9, numbered paragraph 8, claims 2-4, 10-12, and 16 were indicated as containing allowable subject matter. All of the features of allowable claim 16 have been added to amended independent claim 1. Accordingly, each of allowable dependent claims 2-4 and 10-12 depends on amended independent claim 1. Therefore, reconsideration and withdrawal of the outstanding objection to allowable claims 2-4 and 10-12 is respectfully requested.

#### **CONCLUSION**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

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Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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